

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHASTITY PENDELTON,
)
Plaintiff,
)
v.
)
JOSEPH KENNETH STAGEMAN,
)
Individually and as agent for ELEMENT
)
FLEET CORPORATION d/b/a GELCO
)
CORP., GELCO CORP, and ELEMENT
)
VEHICLE MANAGEMENT SERVICES,
)
LLC, and ELEMENT FLEET
)
CORPORATION d/b/a GELCO CORP,
)
GELCO CORP, and ELEMENT VEHICLE
)
MANAGEMENT SERVICES, LLC.
)
Defendants.
)

NOTICE OF REMOVAL

NOW COMES the defendants, JOSEPH KENNETH STAGEMAN, Individually, incorrectly sued as an agent of ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC; ELEMENT FLEET CORPORATION d/b/a GELCO CORP, GELCO CORP; and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, by its attorneys, Alan Schumacher and Michael Barry of PRETZEL & STOUFFER, CHARTERED, and hereby removes this civil action, case number 2019 L 005240 from the Circuit Court of Cook County, State of Illinois, to the United States District Court for the North District of Illinois, Eastern Division, pursuant to 28 USC §§ 1441 and 1332. In support thereof, the defendants state as follow:

1. This civil action regarding an automobile accident was commenced against the named defendants in the Circuit Court of Cook County, State of Illinois, on May 14, 2019. (See Complaint, attached hereto as Exhibit A).

2. The Complaint was served through the Illinois Secretary of State on the defendant Stageman on June 14, 2019. (See Summons, attached hereto as Exhibit B). As to the defendants Element Fleet Corporation, Gelco Corporation, and Element Fleet Vehicle Management Services, LLC, they were served in Maryland on June 20, 2019. (See Summons, attached hereto as Group Exhibit C).

3. This notice is filed within the time period permitted pursuant to 28 USC §§ 1441 and Fed. R. Civ P. Rule 6(a)(1)(C).

4. Any civil action brought in a state court of which the District Courts of the United States have original jurisdiction may be removed by the defendant to the district court of the United States for the district and division embracing the place where such action is pending. 28 USC §1441.

5. The district courts shall have original jurisdiction of all civil actions where the amount in controversy exceeds \$75,000.00, exclusive of interest and costs, and where there is complete diversity. 28 USC §1332. There is complete diversity when, at the time that the action was commenced, every plaintiff is of diverse citizenship as every defendant. *Id.*

6. As to the plaintiff, the complaint does not set forth an allegation as to her residence. Upon information and belief, the plaintiff's current address is 4812 Indigo Place, Roscoe, IL 61073-6002. At the time the incident, the plaintiff's mailing address was in Elgin, Illinois. (See Illinois Traffic Crash Report attached hereto as Exhibit D).

7. As to defendant Stageman, he is a resident of the state of Wisconsin and was so at the time of the traffic accident. (See Illinois Traffic Crash Report. (See Exhibit D)).

8. At the time the action commenced, the defendant Element Fleet Corporation was and is now incorporated in Delaware with its principal place of business in Maryland. (See affidavit of Christine Morris, attached hereto as Exhibit E). The defendant Gelco Corp was and is now incorporated in Minnesota with its principal place of business in Maryland. (See Exhibit E). The defendant Element Vehicle Management Services, LLC was and is now incorporated in Delaware with its principal place of business in Maryland. (See Exhibit E). Element Vehicle Management Services, LLC is a fully owned subsidiary of Element Fleet Corporation. (See Exhibit E).

9. “All corporations are treated alike for diversity purposes: all are citizens both of the state of incorporation and the state in which the corporation has its principal place of business.” *Wise v. Wachovia Securities, LLC*, 450 F.3d 265, 267 (7th Cir. 2006). Accordingly, the corporate defendants are deemed to be citizens of the State of Delaware, Minnesota, and Maryland, and complete diversity exists in this case.

11. The defendants have a good faith basis to believe that the amount in controversy exceeds the jurisdictional amount of \$75,000, exclusive of interest and costs. The plaintiff’s request for relief requests a judgment in excess of \$100,000. (See Exhibit A, plaintiff’s prayer for relief). Upon this information, there is a good faith basis to assert that the amount in controversy exceeds the jurisdictional amount.

12. Therefore, the United States District Courts have original jurisdiction for this civil action under 28 USC §1332 because there is complete diversity and the amount in controversy could exceed \$75,000.00.

13. This Notice of Removal is filed in the United States District Court for the Northern District of Illinois, Eastern Division, which is the district and division in which the State action is pending.

14. Pursuant to 28 U.S.C. § 1446(d), the defendants shall file a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County, State of Illinois, and serve the plaintiff with this Notice of Removal promptly after filing this Notice.

WHEREFORE, the defendants pray that this cause be removed to the United States District Court for the Northern District of Illinois, Eastern Division, for the reasons set forth above.

Respectfully submitted,

/s/ Michael A. Barry
Michael A. Barry - 6295841
PRETZEL & STOUFFER, CHARTERED
One S. Wacker Drive
Suite 2500
Chicago, IL 60606
Telephone: (312) 578-7865
Fax: (312) 346-8242
mbarry@pretzelstouffer.com
Attorney for Defendants

CERTIFICATE OF SERVICE

A copy of the **Notice of Removal and Attestation** was filed electronically this **22nd** day of July, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the court's electronic system.

ATTORNEY FOR PLAINTIFF

Law Offices of Gregory A. Harris
368 W. Huron Street – Suite 200N
Chicago, IL 60654
312-624-9979
Attorney # 31955
greg@gaharrislaw.com

/s/ Michael A. Barry
Michael A. Barry - 6295841
PRETZEL & STOUFFER, CHARTERED
One S. Wacker Drive
Suite 2500
Chicago, IL 60606
Telephone: (312) 578-7865
Fax: (312) 346-8242
mbarry@pretzelstouffer.com
Attorney for Defendants

12-Person Jury

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION**

FILED
5/14/2019 4:58 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL

CHASTITY PENDELTON,)	2019L005240
)	
)	
Plaintiff,)	
vs.)	No.
)	
JOSEPH KENNETH STAGEMAN,)	
individually and as agent for ELEMENT)	
FLEET CORPORATION d/b/a GELCO)	
CORP., GELCO CORP, and ELEMENT)	
VEHICLE MANAGEMENT SERVICES,)	
LLC, and ELEMENT FLEET)	
CORPORATION d/b/a GELCO CORP.,)	
GELCO CORP, and ELEMENT VEHICLE)	
MANAGEMENT SERVICES, LLC.,)	
)	
Defendants.)	

COMPLAINT AT LAW

COUNT I

Now comes Plaintiff, CHASTITY PENDELTON, by and through her attorneys, the LAW OFFICES OF GREGORY A. HARRIS, and complaining of Defendant, JOSEPH KENNETH STAGEMAN, ("STAGEMAN") individually, and as agent for ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, (Collectively "GELCO"), states as follows:

1. On or about July 18, 2017, Plaintiff, CHASTITY PENDELTON, was operating a vehicle which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.

EXHIBIT

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A

2. On or about July 18, 2017, Defendant, STAGEMAN, was operating a vehicle owned by GELCO, which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.
3. At all relevant times, STAGEMAN, was acting as an agent, employee and servant of GELCO.
4. That at all times mentioned herein, Plaintiff was in the exercise of due care for her own safety.
5. That at all times, it was the duty of the Defendant to operate said vehicle so as not to negligently injure Plaintiff.
6. Defendant, notwithstanding this duty, was guilty of one or more of the following acts or omissions:
 - a) Carelessly and negligently failed to maintain a reasonably careful lookout;
 - b) Carelessly and negligently operated and controlled said vehicle;
 - c) Carelessly and negligently drove said vehicle at a speed greater than reasonable and proper under the circumstances and in violation of Section 11-601, Chapter 95 1/2 of the Illinois Revised Statutes;
 - d) Carelessly and negligently failed to reduce the speed of said vehicle, when Defendant could or should have seen Plaintiff's vehicle;
 - e) Failed to yield the right of way to Plaintiff's vehicle;
 - f) Failed to operate said vehicle in such a fashion as to avoid it from colliding with the Plaintiff's vehicle;
 - g) Failed to warn the Plaintiff that a collision was imminent;

h) Was otherwise careless and negligent.

7. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions by the Defendant, the vehicle driven by the Defendant was caused to strike with great force and violence Plaintiff's vehicle.

8. As a direct and proximate result of the collision, Plaintiff suffered serious and permanent injuries both internally and externally; suffered great pain and anguish, and will so suffer in the future.

9. As a result of the collision, Plaintiff was compelled to expend sums of money to be cured of her injuries and will continue to so spend in the future for that purpose; and was hindered and delayed in her hobbies and occupation.

WHEREFORE, Plaintiff, CHASTITY PENDELTON, requests a judgment against Defendant, JOSEPH KENNETH STAGEMAN, in a sum in excess of ONE HUNDRED THOUSAND and 00/100 (\$100,000.00) DOLLARS.

COUNT II

Now comes Plaintiff, CHASTITY PENDELTON, by and through her attorneys, the LAW OFFICES OF GREGORY A. HARRIS, and complaining of Defendants, ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, (Collectively "GELCO"), states as follows:

1. On or about July 18, 2017, Plaintiff, CHASTITY PENDELTON, was operating a vehicle which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.

2. On or about July 18, 2017, Defendant, GELCO, by and through its agent, employee and servant, STAGEMAN, owned and was operating a vehicle which was traveling westbound on I-94 at or near milepost 25, Township of Deerfield, Lake County, State of Illinois.
3. At all relevant times, STAGEMAN, was acting as an agent, employee and servant of GELCO.
4. That at all times mentioned herein, Plaintiff was in the exercise of due care for her own safety.
5. That at all times, it was the duty of the Defendants to operate said vehicle, by and through its agent, employee and servant, so as not to negligently injure Plaintiff.
6. Defendants, by and through their agent, employee and servant, notwithstanding this duty, were guilty of one or more of the following acts or omissions:
 - a) Carelessly and negligently failed to maintain a reasonably careful lookout;
 - b) Carelessly and negligently operated and controlled said vehicle;
 - c) Carelessly and negligently drove said vehicle at a speed greater than reasonable and proper under the circumstances and in violation of Section 11-601, Chapter 95 1/2 of the Illinois Revised Statutes;
 - d) Carelessly and negligently failed to reduce the speed of said vehicle, when Defendant could or should have seen Plaintiff's vehicle;
 - e) Failed to yield the right of way to Plaintiff's vehicle;
 - f) Failed to operate said vehicle in such a fashion as to avoid it from colliding with the Plaintiff's vehicle;
 - g) Failed to warn the Plaintiff that a collision was imminent;

- h) Was otherwise careless and negligent.

7. Defendants, notwithstanding this duty, were guilty of one or more of the following acts or omissions:

- a) Failed to properly train co-Defendant, STAGEMAN, in the operation of the vehicle;
- b) Failed to properly supervise co-Defendant, STAGEMAN, in the operation of the vehicle;

8. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions by the Defendants, by and through their agent, employee and servant, the vehicle driven by STAGEMAN was caused to strike with great force and violence Plaintiff's vehicle.

9. As a direct and proximate result of the collision, Plaintiff suffered serious and permanent injuries both internally and externally; suffered great pain and anguish, and will so suffer in the future.

10. As a result of the collision, Plaintiff was compelled to expend sums of money to be cured of her injuries and will continue to so spend in the future for that purpose; and was hindered and delayed in her hobbies and occupation.

WHEREFORE, Plaintiff, CHASTITY PENDELTON, requests a judgment against Defendants, ELEMENT FLEET CORPORATION d/b/a GELCO CORP., GELCO CORP, and ELEMENT VEHICLE MANAGEMENT SERVICES, LLC, (Collectively “GELCO”), in a sum in excess of ONE HUNDRED THOUSAND and 00/100 (\$100,000.00) DOLLARS.

Respectfully submitted,



Attorney for Plaintiff, CHASTITY
PENDELTON

Law Offices of Gregory A. Harris
368 W. Huron St. - Suite 200N
Chicago, IL 60654
(312) 624-9979
Attorney # 31955
greg@gaharrislaw.com



OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

June 14, 2019

Law Offices of Gregory A. Harris
368 West Huron Street, Suite 200N
Chicago, IL 60654

Dear Sir or Madam:

Copies of Summons(es), Complaint(s) at Law, and Affidavit(s) of Compliance with proper fee(s) have been received on the following:

**Chastity Pendleton v. Joseph Kenneth Stageman, #19 L 5240, Fee
\$5.00**

Filing and Service have been accepted on 6/14/2019 in compliance with the provisions of 625 ILCS 5/10-301 or provisions of 735 ILCS 5/2-203.1 as applicable.

Sincerely,

Jesse White

Jesse White
Secretary of State

ALL INQUIRIES CALL:

(217)785-3096
Office of the General Counsel
298 Howlett Building
Springfield, IL 62756

JW:tf
Enclosure

Springfield, Illinois 62756

EXHIBIT

tabbies

B

FILED
5/14/2019 4:58 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL

2019L005240

2019L005240

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

CHASTITY PENDELTON

(Name all parties)

v

Case No.

Joseph Kenneth Stageman
3601 County Road O
Saukville, WI 53080

SUMMONS ALIAS SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit www.cookcountyclerkoffcourt.org to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org
Page 1 of 3

Summons - Alias Summons

(08/01/18) CCG 0001 B

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office. 5/14/2019 4:58 PM DOROTHY BROWN

FILED DATE: 5/14/2019 4:58 PM 2019L005240

Atty. No.: 31955

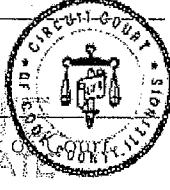
Witness: _____

Atty Name: Gregory A. Harris

Atty. for: Plaintiff

Address: 368 W. Huron St, Ste 200N

City: Chicago


JUN 14 2019
DOROTHY BROWN, Clerk of Court
SECRETARY OF STATE

State: IL Zip: 60654

Telephone: 312-624-9979

Primary Email: greg@gaharrislaw.com

Date of Service: JUN 14 2019

(To be inserted by officer on copy left with
Defendant or other person): Att'l \$3.00

CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- Richard J Daley Center
50 W Washington
Chicago, IL 60602
- District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
- District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
- District 4 - Maywood
1500 Maybrook Ave
Maywood, IL 60153
- District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
- District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
- Domestic Violence Court
555 W Harrison
Chicago, IL 60607
- Juvenile Center Building
2245 W Ogden Ave, Rm 13
Chicago, IL 60602
- Criminal Court Building
2650 S California Ave, Rm 526
Chicago, IL 60608
- Domestic Relations Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Civil Appeals
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Criminal Department
Richard J Daley Center
50 W Washington, Rm 1006
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- County Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Probate Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Law Division
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Traffic Division
Richard J Daley Center
50 W Washington, Lower Level
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

Daley Center Divisions/Departments

- Civil Division
Richard J Daley Center
50 W Washington, Rm 601
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Chancery Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois

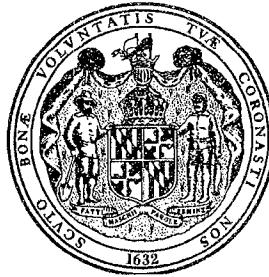
cookcountyclerkofcourt.org

Page 3 of 3

Baltimore City Sheriff's Office

John W. Anderson, Sheriff

Main Office
The Clarence Mitchell Courthouse
100 N. Calvert Street
Baltimore, Maryland 21202
Phone: 410-396-1155
Fax: 410-727-3507



District Court Office
111 N. Calvert Street
Baltimore, Maryland 21202
Phone: 410-396-7412
Fax: 410-396-7439

June 27, 2019

STATE MARYLAND
CITY of BALTIMORE

Re: Chastity Pendleton vs. Joseph Kenneth Stageman

I, D. Field (0395), Process Server of Baltimore City Sheriff's Office, State of Maryland being duly sworn depose and say that I am over the age of twenty-one year, not a party to this action.

On June 20, 2019 at 10:35am, hand to hand serve the Summons to Gelco Corp. c/o SCS-Lawyers Inc. Service Co., 7 St. Paul Street, Ste. 820, Baltimore, Maryland 21202.

D. Field (0395)

Process Server



John W. Anderson, Sheriff

Subscribed to and sworn to before
me this 27th day of June, 2019

Althea F. Bell

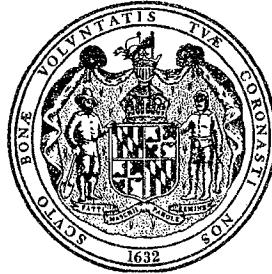
My Commission Expires July 08, 2019

EXHIBIT

Baltimore City Sheriff's Office

John W. Anderson, Sheriff

Main Office
The Clarence Mitchell Courthouse
100 N. Calvert Street
Baltimore, Maryland 21202
Phone: 410-396-1155
Fax: 410-727-3507



District Court Office
111 N. Calvert Street
Baltimore, Maryland 21202
Phone: 410-396-7412
Fax: 410-396-7439

June 27, 2019

STATE MARYLAND
CITY of BALTIMORE

Re: Chastity Pendleton vs. Joseph Kenneth Stageman

I, R. Deadwyler (9869), Process Server of Baltimore City Sheriff's Office, State of Maryland being duly sworn depose and say that I am over the age of twenty-one year, not a party to this action.

On June 24, 2019 at 10:20a, hand to hand serve the Summons and Complaint to Element Vehicle Management Services, c/o SCS-Lawyers Inc. Service Co., 7 St. Paul Street, Ste. 820, Baltimore, Maryland 21202

R. Deadwyler (9869)

Process Server

John W. Anderson

John W. Anderson, Sheriff

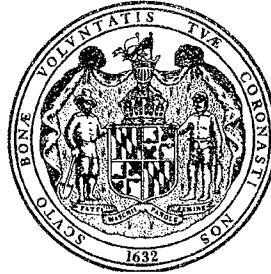
Subscribed to and sworn to before
me this 27th day of June, 2019

Althea F. Bell
My Commission Expires July 08, 2019

Baltimore City Sheriff's Office

John W. Anderson, Sheriff

Main Office
The Clarence Mitchell Courthouse
100 N. Calvert Street
Baltimore, Maryland 21202
Phone: 410-396-1155
Fax: 410-727-3507



District Court Office
111 N. Calvert Street
Baltimore, Maryland 21202
Phone: 410-396-7412
Fax: 410-396-7439

June 27, 2019

STATE MARYLAND
CITY of BALTIMORE

Re: Chastity Pendleton vs. Joseph Kenneth Stageman

I, D. Field (0395), Process Server of Baltimore City Sheriff's Office, State of Maryland being duly sworn depose and say that I am over the age of twenty-one year, not a party to this action.

On June 20, 2019 at 10:35am, hand to hand serve the Summons to Element Fleet Corp., c/o SCS-Lawyers Inc. Service Co., 7 St. Paul Street, Ste. 820 Baltimore, Maryland 21202

D. Field (0395)

Process Se



John W. Anderson, Sheriff

Subscribed to and sworn to before
me this 27th day of June, 2019

Althea F. Bell

My Commission Expires July 08, 2019

ILLINOIS TRAFFIC CRASH REPORT

EXHIBIT

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COMMERCIAL MOTOR VEHICLE (CMV)							
IF MORE THAN ONE CMV IS INVOLVED, USE SR 1050A ADDITIONAL UNITS FORMS.							
<p>A. CMV is defined as any motor vehicle used to transport passengers or property and:</p> <ol style="list-style-type: none"> 1. Has a weight rating of more than 10,000 pounds (example: truck or truck/trailer combination); or 2. Is used or designed to transport more than 15 passengers, including the driver (example: shuttle or charter bus); or 3. Is designed to carry 15 or fewer passengers and operated by a contract carrier transporting employees in the course of their employment (example: employee transporter - usually a van-type vehicle or passenger car); or 4. Is used or designated to transport between 9 and 15 passengers, including the driver, for direct compensation (example: large van used for specific purpose); or 5. Is any vehicle used to transport any hazardous material (HAZMAT) that requires placarding (example: placards will be displayed on the vehicle). 							
CARRIER NAME							
ADDRESS							
CITY/STATE/ZIP							
USDOT NO.	ILCC NO.						
Source of above info: <input type="checkbox"/> Side of Truck <input type="checkbox"/> Papers <input type="checkbox"/> Driver <input type="checkbox"/> Log Book							
Gross Vehicle Weight Rating (GVWR)							
Were HAZMAT placards displayed on the vehicle? <input type="checkbox"/> Y <input type="checkbox"/> N							
If yes, name on placard 4-digit UN no.							
1-digit Hazard Class no.							
Did HAZMAT spill from the vehicle (do not consider fuel from the vehicle's own tank)? <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK							
Did HAZMAT Regulations violation contribute to the crash? <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK							
Did Motor Carrier Safety Regulations (MCS) violation contribute to the crash? <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK							
Was a Driver/Vehicle Examination Report form completed? <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">HAZMAT</td> <td style="width: 50%; text-align: center;"><input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK</td> <td style="width: 50%; text-align: center;"><input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK</td> </tr> <tr> <td style="width: 50%;">MCS</td> <td style="width: 50%; text-align: center;"><input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK</td> <td style="width: 50%; text-align: center;"><input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK</td> </tr> </table>		HAZMAT	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK	MCS	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK
HAZMAT	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK					
MCS	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK					
Form No. _____							
IDOT PERMIT NO. <input type="checkbox"/> N TRAILER WIDTH(S): 0-96" <input type="checkbox"/> 97-102" <input type="checkbox"/> > 102" <input type="checkbox"/> ft							
WIDE LOAD? <input type="checkbox"/> Y <input type="checkbox"/> N							
TRAILER 1 <input type="checkbox"/> ft							
TRAILER 2 <input type="checkbox"/> ft							
TRAILER LENGTH(S): 1 <input type="checkbox"/> ft							
TOTAL VEHICLE LENGTH <input type="checkbox"/> ft							
NO. OF AXLES <input type="checkbox"/> ft							
SELECT CODES FROM BACK COVER OF CRASH BOOKLET:							
VEHICLE BODY TYPE <input type="checkbox"/> WHITE <input type="checkbox"/> 2 Color WHITE							
CARGO BODY TYPE <input type="checkbox"/> Towed by / to							
LOAD TYPE <input type="checkbox"/> LOCAL USE ONLY							

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

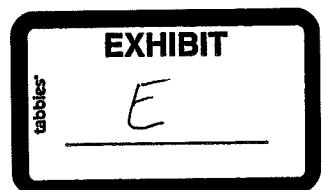
CHASTITY PENDELTON,
)
Plaintiff,
)
v.
)
JOSEPH KENNETH STAGEMAN,
)
Individually and as agent for ELEMENT
)
FLEET CORPORATION d/b/a GELCO
)
CORP., GELCO CORP, and ELEMENT
)
VEHICLE MANAGEMENT SERVICES,
)
LLC, and ELEMENT FLEET
)
CORPORATION d/b/a GELCO CORP,
)
GELCO CORP, and ELEMENT VEHICLE
)
MANAGEMENT SERVICES, LLC.
)
Defendants.
)

AFFIDAVIT

I, Christine Morris, being first duly sworn upon her oath, deposes and says:

That this AFFIDAVIT is made upon my personal knowledge and if I were sworn as a witness at the trial of the above-captioned lawsuit, I could competently testify to the following facts:

1. I am an individual over the age of 18, of sound mind and body, and have personal knowledge of the facts contained in this affidavit.
2. I am the Legal Support Administrator for Element Fleet Management. My office is located at 940 Ridgebrook Road, Sparks, Maryland 21152.
3. Gelco Corp. was a Delaware Corporation, and was purchased by Element Fleet Corporation on September 1, 2015.
4. On January 1, 2018, Gelco Corp. changed its name to Element Fleet Corporation. Element Fleet Corporation provides fleet management services for commercial vehicle fleets.



5. Element Fleet Corporation was and is now incorporated in Delaware with its principal place of business in Maryland.
6. Gelco Corp is currently incorporated in Minnesota with its principal place of business in Maryland.
7. Element Vehicle Management Services, LLC is doing business as Element Fleet Management. Element Vehicle Management Services, LLC was and is now incorporated in Delaware with its principal place of business in Maryland. Element Vehicle Management Services, LLC operates as a fully owned subsidiary of Element Fleet Corporation. Element Fleet Corporation is the only member of the LLC.

Further Declarant saith not.

I, Christine Morris, declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 22, 2019

Christine Morris

Christine Morris